

Copper Valley Wireless, Inc.
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Via ECFS Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

Attn: Chief, Wireless Telecommunications Bureau and
Chief, Enforcement Bureau

Re: CC Docket No. 94-102
Cellular Radiotelephone Service Station KNKQ401,
CMA Market No. 316(B4), Alaska 2(B4) - Bethel RSA.

E-911 Interim Report

Dear Ms. Dortch:

This report is being submitted pursuant to the requirements of the Commission's Order (CC Docket No. 94-102), FCC 05-79, released April 1, 2005 ("Order"), which disposed of various requests for relief from certain of the E-911 requirements set forth in the Rules; and pursuant to the Commission's Public Notice, entitled "Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings by Small Sized Carriers," Mimeo DA 03-2113, released June 30, 2003.

The Filer, Copper Valley Wireless, Inc., is a Tier III non-nationwide Commercial Mobile Radio Service carrier who was specifically granted relief in the Order. The information is presented in the format specified by the Commission, as follows:

A) The Number Of Phase I And Phase II Requests From PSAPs (including those the carrier may consider invalid), and the status of those requests, including whether the carrier and the PSAP have reached an alternate deployment date: The Public Safety Answering Points ("PSAPs") in the Filer's service area as follows: 1) Valdez City Limits – Valdez Police Department; 2) Cordova City Limits – Cordova Police Department; 3) Copper River Basin – The Division of Alaska State Troopers; 4) Prince William Sound – The Division of Alaska State Troopers and the United States Coast Guard; 5) McCarthy/Kennicott – The Division of Alaska State Troopers; and 6) Whittier City Limits – Whittier Police Department.

The Filer has not received any requests for Phase I or Phase II E-911 service.

B) The Carrier's Specific Technology Choice (i.e., network-based or handset-based solution, as well as the type of technology used): The Filer intends to employ a handset-based Automatic Location Information ("ALI") technology. The Filer's system currently utilizes analog equipment manufactured by Plexsys, equipment which has been discontinued by the manufacturer and which is no longer being supported by the manufacturer, and which is incapable (and which cannot be made capable) of processing E-911 Automatic Location Information ("ALI") data elements and transmitting those data elements to a PSAP. The Filer's system currently has no digital transmission capacity.

The Filer has been unable to locate Phase I or Phase II E-911 equipment and software which is compatible with the Filer's existing cellular system equipment.

The Filer is exploring the financial and technical feasibility of replacing the existing analog system with a state-of-the-art digital system using either a CDMA or GSM air interface. The replacement equipment would be E-911 capable.

C) Status Of Ordering And/Or Installing Necessary Network Equipment: To date, the Filer has not ordered any E-911 network equipment. As noted above, the system currently employs analog-only Plexsys equipment, which has been discontinued by the manufacturer and which is no longer being supported by the manufacturer; and the Filer has been unable to locate any E-911 equipment and software which is compatible with the Filer's current cellular system equipment.

D) If The Carrier Is Pursuing A Handset-Based Solution, Include Information On Whether ALI-Capable Handsets Are Now Available, And Whether the Carrier has Obtained ALI-Capable Handsets Or Has Agreements In Place To Obtain These Handsets: The Filer operates a small, stand-alone analog cellular system which serves a sparsely populated rural area. The Filer's service area covers a portion of the Alaska 2 – Bethel RSA. To date, the Filer has no agreements in place with handset manufacturers to obtain ALI-capable handsets. After due inquiry, the Filer has been unable to locate ALI capable handsets which are compatible with the Filer's current cellular system equipment.


E) The Estimated Date On Which Phase II Service Will First Be Available In The Carrier's Network: Since the Filer has not received a PSAP request for Phase II E-911 service, the Filer is unable to estimate the date on which Phase II service will first be available in the Filer's service area. As noted above, there is no E-911 equipment available which is compatible with the Filer's current cellular system equipment.

F) Information On The Carrier's Progress Towards Ensuring That Ninety-Five Percent Of Its Subscriber Base Has Location Capable Handsets: Due to equipment availability problems, the Filer does not believe that it can meet the December 31, 2005 ultimate implementation date requiring a 95% penetration rate for ALI-capable handsets among its subscribers.

Very truly yours,

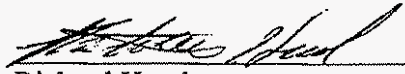
Copper Valley Wireless, Inc.

Dated: August 30, 2005

By: 
Richard Hood
Subsidiaries Manager

Declaration Under Penalty Of Perjury

I, Richard Hood, hereby state the following under penalty of perjury: I am the Subsidiaries Manager of Copper Valley Wireless, Inc. I have read the foregoing "E-911 Interim Report," and all statements of fact set forth therein are true and correct to the best of my knowledge, information and belief, and are made in good faith. Executed this 30 day of August, 2005.


Richard Hood

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